

## **REMARKS**

### **1. Introduction**

In the Office Action mailed March 30, 2005, the Examiner rejected claims 1-5, 7, 9-13, and 15-21 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,691,227 (Neves) in view of U.S. Patent No. 6,061,634 (Coile). The Examiner also rejected claims 1 and 13 under a theory of obviousness-type double patenting as not being patentably distinct from U.S. Patent No. 6,353,614 (Borella). The Examiner indicated that claim 8 contained allowable subject matter but objected to claim 8 as being dependent upon a rejected base claim.

In this Response, Applicants have amended claims 1, 3, and 13 and have canceled claim 2. Thus, claims 1, 3-5, 7-13, and 15-21 are currently pending.

Applicants respectfully request reconsideration of the claims, as amended herein, for the reasons set forth below.

### **2. Response to § 103 Rejections**

#### **a. Claims 1, 3-5, and 7-12**

Of these claims, claim 1 is independent. The Examiner rejected claim 1 under § 103 as being unpatentable over Neves in view of Coile. In response, Applicants have amended claim 1 to recite the step of “transmitting said first range of globally unique port numbers to said first mobile node,” and have canceled claim 2, which had recited this additional step. Applicants respectfully submit that with this amendment, claim 1 is clearly allowable.

Applicants recognize that the Examiner previously rejected claim 2 under § 103 as being unpatentable over Neves in view of Coile. However, Applicants respectfully submit that this

rejection of claim 2 was not well founded. In rejecting claim 1, the Examiner identified client device 330 in Neves as a “first mobile node” and alleged that Neves teaches assigning a unique port number to this mobile node (col. 12, lines 43-49). The Examiner did not specify what in Neves constituted a “unique port number.” However, the section of Neves cited by the Examiner states that “the local HAM host selects a masquerading address and port for the connection between the client and server” (col. 12, lines 44-46) and that “[t]he port must not be shared by any other active connection” (col. 12, lines 49). Thus, the masquerading port selected by the local HAM host is the “unique port number,” according to the Examiner’s rationale.

In rejecting claim 2, the Examiner alleged that Neves teaches transmitting the unique port number to the mobile node (col. 12, line 66 – col. 13, line 2). However, this section in Neves does not teach that the masquerading port (the “unique port number” in the Examiner’s rationale) is transmitted to client device 330 (the “first mobile node” in the Examiner’s rationale). Instead, this section teaches that a “routing coordinator” is notified of the masquerading port:

At Block 930, the HAM notifies the routing coordinator about the new connection (providing the client address and port, the server address address and port, masquerading address and port, and HAM identity).

(col. 12, line 66 – col. 13, line 2). Thus, the Examiner’s rationale did not support the Examiner’s rejection of claim 2.

Moreover, in the Neves approach, the masquerading port would not be transmitted to client device 330 for the simple reason that client device 330 does not use the masquerading port. For example, Figure 3 of Neves shows that client device 330 transmits and receives packets using its own client address and client port, not the masquerading address and masquerading port. Thus, Neves does not teach transmitting a globally unique port number to a mobile node. Because the

Examiner's rationale relies on Neves for the "transmitting" step, the Neves/Coile combination does not teach the method of claim 1, as amended.

Accordingly, Applicants respectfully submit that claim 1, as amended, is clearly allowable. Applicants further submit that claims 3-5 and 7-12 are also allowable as depending from an allowable claim.

**b. Claims 13 and 15-21**

Of these claims, claim 13 is independent. The Examiner rejected claim 13 under § 103 as being unpatentable over Neves in view of Coile. In response, Applicants have amended claim 13 to specify that the first data record identifies a first range of globally unique port numbers for the first mobile node, the second data record identifies a second range of globally unique port numbers for the second mobile node, and the first and second ranges are disjoint.

In rejecting claim 13, the Examiner acknowledged that Neves does not teach using disjoint sets of globally unique port numbers. Instead, the Examiner alleged that Coile teaches using disjoint sets of globally unique port numbers (col. 6, line 62 – col. 7, line 1). What Coile teaches, however, is mapping well known port numbers for different virtual machines to different ports on a physical machine. Coile does not teach disjoint ranges of globally unique port numbers for different mobile nodes.

Accordingly, Applicants respectfully submit that claim 13, as amended, is clearly allowable. Applicants further submit that claims 15-21 are allowable as depending from an allowable claim.

**2. Response to Double-Patenting Rejections**

The Examiner has rejected claims 1 and 13 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over Borella. As noted above, Applicants have amended claims 1 and 13. Accordingly, Applicants respectfully submit that the Examiner's double-patenting rejections of claims 1 and 13 are moot.

**3. Conclusion**

For the foregoing reasons, Applicants submit that the present application is now in condition for allowance, and notice to that effect is hereby requested. Should the Examiner feel that further dialog would advance the subject application to issuance, he is invited to telephone the undersigned at any time at (312) 913-0001.

Respectfully submitted,

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